

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

FINAL TITLE VF PERMIT NO. VF-01-003

ATOFINA Chemicals, Incorporated

ELIZABETHTOWN KY

AUGUST 9, 2001

REVIEWER: JIM NEAL

PLANT I.D. # 21-041-00002

APPLICATION LOG # 53610

**SOURCE DESCRIPTION:**

B48

This area is dedicated to the production of butyltin, octyltin, and methyltin stabilizers. Five production lines are in operation. A typical production line includes reactor, receiver, split tanks, shared hold tank, and process filter. Four production lines are normally used to produce stabilizer. The fifth line (and occasionally the fourth) is used for the production of monobutyltin trichloride and dibutyltin dichloride. Production is limited to the materials and values contained in the permit, herein. These are intermediate materials used in the production of the stabilizers.

Materials charged to reactor may include monobutyltin trichloride, dibutyltin trichloride, sodium sulfide, 2-ethylhexyl mercapto acetate, 2-mercaptoethyl thallate, n-dodecylmercapto acetate, and sodium hydroxide. Products include one or more complex organotin molecules. The product phase is separated after adding a surfactant, followed by heating to drive out water. The mass is diluted, filtered, and pumped to drums or totebins.

B5 & B3

This permit will also allow the addition of a second strip tank to the B-05 area which will improve the utilization of the B-05 area by allowing operations to continue during maintenance and cleaning activities of the existing tank. Improvements to the vacuum system may also improve the reliability. The B-03 and 05 production areas have been included in the synthetic minor limit to ensure that the PTE from each production area is federally enforceable. Production of the respective products are limited to those shown in the permit, and the limit for the B-03 area does not include toluene which will no longer be used at this area for the producing and processing 2-mercaptoethyl thallate.

**PUBLIC AND U.S. EPA REVIEW:**

On June 20, 2001, the public notice on availability of the draft/proposed permit and supporting material for comments by persons affected by the plant was published in *The News-Enterprise* in Elizabethtown, Kentucky. The public comment period expired 30 days from the date of publication. During this time no comments were received from the general public.

The draft/proposed permit and supporting documentation were electronically transmitted to U.S. EPA on June 25, 2001. No comments were received from U.S. EPA during the 45 day comment period.